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**Date:** July 18, 2017

**Re:** Public comments received for GCR 17-019 Adolescent Hospital Diversion Program, effective August 1, 2017.

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***Comment 1:***

Generally, the Office of the Health Care Advocate is supportive of increasing access to community based services that decrease the need for institutional care, as long as these services are adequately funded.

It has been difficult to get enough information about the program to adequately evaluate the proposed change and provide informed comment. We look forward to receiving answers to the questions posed in our first email.

***Response:*** The State appreciates the concern expressed regarding access to appropriate levels of care, particularly in the community, and ensuring funding is available to achieve this. The State went through a rigorous evaluation process with the provider to ensure adequate funding. For more information on [NFI's 6-bed hospital diversion program](#) that is currently being operated, please visit NFI's website.

***Comment 2:***

How will the proposed policy improve access to this program?

***Response:*** This change will increase the number of available beds by 6 (for a total of 12 beds), which will improve access to this more appropriate community level of care in an underserved part of the State. This will also decrease pressure on access to inpatient psychiatric care.

***Comment 3:***

What are the pre-defined outcome measures?

***Response:*** The program's outcome measures are as follows:

- Occupancy rate for the period (target 80%)
- Average length of stay (not to exceed 14 days)
- Complete a Child Behavior Checklist (CBCL) on every adolescent
- Demonstrate that children are discharged to a lower level of care (target 95%)

***Comment 4:***

How many beds does this program currently have and where are those beds located?

***Response:*** This change is an expansion of an already existing program. There are 6 beds that are currently being operated in Burlington, VT. An additional 6 beds will be available in Brattleboro, VT as a result of this change.

***Comment 5:***

How many additional beds do you anticipate being added with this change?

***Response:*** There will be 6 additional beds, bringing the total number of beds to 12.

***Comment 6:***

Is there currently a waitlist for this program and if so, how many people are on it?

***Response:*** This program does not operate with a waitlist; it uses a triage system designed to alleviate pressure on emergency departments.